

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	CRIMINAL NO. 98-CR-30022-NJR
vs.	)	
	)	
DEANDRE LEWIS,	)	
	)	
Defendant.	)	

**Motion Instanter for Extension of Time to File Response**

The United States of America, by Rachelle Aud Crowe, United States Attorney for the Southern District of Illinois, and Thomas E. Leggans, Assistant United States Attorney, moves this Court for an extension of time to file a response to document 991.

1. The Defendant, Deandre Lewis, has filed a Motion for Sentence Reduction under 18 U.S.C. § 3582(c)(2). ECF 991. This Court ordered the Government to respond to that Motion by January 6, 2025. ECF 992. Due to inadvertence, counsel failed to docket that response date on his calendar. Counsel discovered this error on January 13, 2025.

2. Over the last three months, undersigned counsel has been devoting significant time to several separate family medical issues. Undersigned counsel also recently prepared and filed on January 3, 2025, a 44-page response to a 2255 Motion in *United States v. Leal*, 24-cv-02254-JPG. The preparation of that response took approximately two weeks.

3. Because of the foregoing, counsel requests a 30-day extension to file his

response to the Defendant's Motion for Compassionate Release.

Respectfully submitted,

RACHELLE AUD CROWE  
United States Attorney

*s/ Thomas E. Leggans*  
THOMAS E. LEGGANS  
Assistant United States Attorney  
402 W. Main  
Benton, IL 62812  
Phone: (618) 439-3808  
Tom.Leggans@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2025, I electronically filed

**Motion Instanter for Extension of Time to File Response**

with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

Sent via USPS to:

**Deandre Lewis**

24956-044

POLLOCK FCI

FEDERAL CORRECTIONAL INSTITUTION

P O BOX 4050

POLLOCK, LA 71467

PRO SE

Respectfully submitted,

RACHELLE AUD CROWE

United States Attorney

*s/ Thomas E. Leggans*

THOMAS E. LEGGANS

Assistant United States Attorney

402 W. Main

Benton, IL 62812

Phone: (618) 439-3808

Tom.Leggans@usdoj.gov